

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Sharon Dalto, Plaintiff, v. Northstar Location Services, LLC c/o CT Corporation System 208 S. LaSalle Street, Suite 814 Chicago, IL 60604, Defendant.	Case No. COMPLAINT Jury Demand Requested
--	--

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §§1331, 1337, 1367; and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 4- Plaintiff is a resident of the State of Illinois.
- 5- Defendant is a corporation with its principal office in the State of New York.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collects, or attempts to collect, debts owed or due another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

FACTS COMMON TO ALL COUNTS

- 9- On or around April 18, 2014, Defendant telephoned Plaintiff& Sister-in-law (ðSILö).
- 10- During this communication, Defendant disclosed the existence, nature, and/or amount of the debt to SIL.
- 11- At the time of this communication, Defendant knew, or should have known, that Plaintiff did not reside with SIL.
- 12- At the time of this communication, Defendant did not have permission to speak with SIL.
- 13- Defendant damaged Plaintiff.
- 14- Defendant violated the FDCPA.

COUNT I

- 15- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 16- Defendant violated 15 USC § 1692b(a) by disclosing the existence, nature, and/or amount of the Debt to a person other than Plaintiff.

COUNT II

- 17- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 18- Defendant violated 15 USC § 1692e(10) by using false representations and/or deceptive means to collect, or attempt to collect, the Debt.

COUNT III

- 19- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 20- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, the Debt.

COUNT IV

- 21- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

22- Defendant violated 15 USC § 1692e by engaging in false, deceptive, or misleading methods to collect a debt.

JURY DEMAND

23- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

24- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3);
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

By: /s/ Richard J. Meier

Richard J. Meier, Esq.
53 W. Jackson Blvd, Suite 304
Chicago, IL 60604
Tel: 312-242-1849
Fax: 312-242-1841
richard@meierllc.com
Attorney for Plaintiff